

JOHN SEXTON CONTRACTORS COMPANY

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TEL. 312/654-1290

April 26, 1974

Mr. D. M. Wallace
Environmental Geologist
Division of Land Pollution Control
Environmental Protection Agency
2200 Churchill Rd.
Springfield, Ill. 62706



Re: 03115901
Cook County-Land Pollution Control
Lansing/Sexton

Dear Mr. Wallace:

We have been reviewing the data and communications concerning the Sexton site referenced above. We will of course comply with the requested submission, but at the present time your assistance in determining the exact nature of the required data would be greatly appreciated.

We have ascertained the following facts concerning our past activities and those of our engineers, drillers and laboratories.

1. The site was originally a clay pit for the manufacture of brick. Although the site had long since been used for brick making, there is evidence that dumping of municipal refuse, slag and ore residues as well as liquid wastes on the site occurred prior to our initial explorations of 1970.
2. EPA Permit #1971-1 was issued requiring the installation of four piezometers to provide sampling points and water level measurements at such locations and at such times as requested by the Agency (2/4/1971).

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3. On April 6, 1971 our geologist, Walter H. Flood & Co., Inc. received a letter describing the piezometer installations desired in both the dolomite and upper levels (8 piezometers - 2 in each well).
4. In October, 1971, Walter H. Flood and Co., Inc. completed their soil investigation document analysing the drilling done in January and February of 1971. It is our belief that the letter of April 6, 1971 was based on that drilling data discussed on 1/7/71, 1/11/71, 1/29/71, 2/25/71 and 3/31/71 between our Ray Flood and your Mr. Palmquist.
5. We note that the drilling resulted in the placement of 1 $\frac{1}{4}$ Dia. Schedule 40 plastic pipe with #10 screens. Each well location consists of two wells rather than the single well and double piezometer installation described 4/6/1971. Observation wells were completed during the period April 12 - 20, 1971.
6. Our next file data includes the response of April 26, 1972 to our letter requesting permit renewal (3/17/72). This letter indicates that additional boring may be necessary and that piezometer installations shall be required as per the letter of April 6, 1971, adding that 2" minimum I.D. non-metallic casing should be used.

Permit re-issuance was denied pending meeting the conditions stated.

7. On June 5, 1972 the proper data had been submitted and the permit #1972-43 was issued. Included in this permit were the requirements for background analysis of the shallow piezometer water quality in either well 1A or 2A. Thirty three specific tests were designated. Each of the other shallow piezometers was required to be analyzed quarterly for T.D.S. and Chlorides and water levels.
8. On March 23, 1973 the appropriate samples were taken by the Flood company and this sampling was reported to you as confirmation of our compliance with EPA requirements.
9. In reviewing the results of the March 1973 sampling (copies are appended to this letter, it is obvious that the background samples were showing the presence of illicit disposal operations prior to our presence. The high total bacteria counts, low chlorides, and the presence of heavy metals would indicate industrial and/or municipal liquids and/or sludges may have been disposed of on site.

Sampling of downstream surface waters indicated acceptable levels of Fecal Coliform. These samples were taken from the deep well piezometers and 4A was reported "lost".

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10. Upon our reminder to Flood that we required quarterly reports, he sampled again in February of 1974. These samples were retrieved from shallow piezometers and analysis was for T.D.S., chlorides, and iron with a 21 item run of the sample from well number 2A-2. The analysis schedule is apparently in agreement with your requirements as stated in your letter of April 4, 1974; however, the sampler has used different wells than the background data and provided total analysis on a well which did not receive it originally.

We are quite concerned with the confusion to date and would like to provide clarification in the following manner:

- A. All analysis to date indicates that the previous site activities have raised levels of indicators and thus the background analysis is extremely poor but probably representative.
- B. Both deep and shallow piezometers are in place. The continued monitoring as required should be restricted to either levels but not both. The set of monitoring wells not in use should be permanently sealed.
- C. Quarterly analysis of shallow piezometers at 1A, 2A, 3A and 4A would provide sufficient data as the fill progresses (water level also.)

Please accept our apologies for our past performances. As previously reported we have taken over the complete responsibility for obtaining the samples, submitting them to the laboratory and reporting the data to you.

Please confirm the acceptability of the above program or advise us of the required procedure to set our project straight.

Yours very truly,

JOHN SEXTON CONTRACTORS CO.



Arthur A. Daniels

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